

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

UNIVERSITY OF VERMONT	)	
STUDENTS FOR JUSTICE	)	
IN PALESTINE,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:24-cv-978
	)	
THE UNIVERSITY OF VERMONT	)	
AND STATE AGRICULTURAL	)	
COLLEGE; and LINA BALCOM,	)	
UVM DIRECTOR OF STUDENT	)	
LIFE and JEROME BUDOMO,	)	
UVM ASSOCIATE DIRECTOR OF	)	
STUDENT LIFE, EACH IN THEIR	)	
OFFICIAL CAPACITIES,	)	
	)	
Defendants.	)	

**DEFENDANTS' MOTION TO FILE UNDER SEAL**

Defendants University of Vermont and State Agricultural College (“UVM”), Lina Balcom, and Jerome Budomo, by and through their attorneys, Dinse, P.C., move pursuant to Local Rule 5.2 for permission to file under seal the following documents in support of Defendants’ Opposition to Plaintiff’s Motion for a Preliminary Injunction because they contain personally identifying information of students that is protected from disclosure under the Family Educational Rights and Privacy Act of 1974 or otherwise implicate student privacy:

Exhibit No.	Document Description
-	Declaration of Lina Balcom in Support of Defendants’ Opposition to Plaintiff’s Motion for a Preliminary Injunction
6	July 31, 2024 to August 9, 2024 – Email chain
9	May 2, 2024 to May 6, 2024 – Email chain
11	August 27, 2024 – Email from David Nestor to student with attachments
12	August 29, 2024 – Email from David Nestor to student

Undersigned counsel asked counsel for Plaintiff, John Franco, Esq., for his position on this request to seal, but Attorney Franco was not able to provide Plaintiff's position before the time of filing.

Defendants ask the Court to grant this motion and seal the unredacted versions of the documents listed above. Redacted versions will be filed on the public docket.

Dated at Burlington, Vermont this 25th day of September 2024.

/s/ Kendall Hoechst  
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